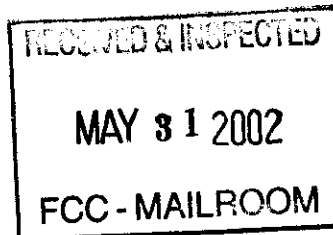


ORIGINAL**Denise B. Moline, Esq.**

PMB #215
 1212 So. Naper Blvd., Suite 119
 Naperville, IL 60540



Phone: 630-753-0112

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E-Mail: DBMoline@earthlink.net

Admitted: District of Columbia
 Florida (inactive)
 Virginia (inactive)

May 30, 2002

Re: MM Docket No. 02-12, RM-10356
Ash Fork, AZ
Comments in Support of Joint Reply
Comments and Counterproposal
DBMPC #15133

Marlene H. Dortch, Secretary
 Federal Communications Commission
 445 12th St., SW, Room TW-A325
 Washington, DC 20554

VIA FEDERAL EXPRESS

Dear Ms. Dortch:

On behalf of Tusayan Broadcasting Co., Inc., Licensee of Station KSGC, Tusayan, Arizona, there is submitted herewith Tusayan's Comments in Support of the Joint Reply Comments filed by NPR Phoenix, LLC and Spectrum Scan, LLC, together with its Counterproposal for an upgrade to the channel allotment proposed for Tusayan in the Joint Reply Comments. An Engineering Statement demonstrating that the upgraded channel is compatible with the other counterproposals made in the Joint Reply Comments is attached.

Should there be any question concerning the attached Comments and Counterproposal, please contact undersigned Counsel for Tusayan Broadcasting Co., Inc.

Very truly yours,

Denise B. Moline

DBM:wp
 Attachment

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

RECEIVED & INSPECTED
MAY 31 2002
FCC - MAILROOM

In re: Amendment of
47 C.R.F. §202(b), Table of Allotments
FM Broadcast Stations
Ash Fork, Arizona

)
)
)
)

MM Docket No. 02-12
RM 10356

To: Chief, Allocations Branch
Mass Media Bureau

***COMMENTS IN SUPPORT OF JOINT REPLY COMMENTS
AND COUNTERPROPOSAL***

Tusayan Broadcasting Company, Inc., by Counsel, hereby respectfully submits its Comments in Support of the Joint Reply Comments submitted by NPR Phoenix, LLC ("NPR") and Spectrum Scan, LLC ("Spectrum Scan") on April 2, 2002, but requests that the Counterproposal submitted in the Joint Reply Comments be modified to allocate Channel 222C2 at Tusayan, Arizona, instead of Channel 222A.

As set forth in the attached Engineering Statement by Owl Engineering, Inc., it is possible to allocate a higher class channel for Station KSGC, presently operating on Channel 221A at Tusayan, AZ, than that proposed in the Joint Reply Comments. NPR and Spectrum Scan proposed that Station KSGC be shifted to Channel 222A in order to accommodate the various counterproposals made in the Joint Reply Comments. Tusayan has no objection to the shift in Channels, provided that Spectrum Scan, the original proponent of the shift, reimburse Tusayan for the reasonable and prudent costs of shifting frequency from Channel 221 to Channel 222. However, Tusayan has determined that


operation on the Channel 222C2, instead of Channel 222A, would also be compatible with all of the other allocation proposals submitted by NPR and by Spectrum Scan.¹

Allocation of a higher class FM channel would allow for expansion of Station KSGC's coverage area population served by the station, and would allow more widespread service throughout the Grand Canyon area. The higher class allocation is also desirable from a service efficiency standpoint.

Accordingly, Tusayan states its support for the Counterproposals submitted by NPR and Spectrum Scan in their Joint Reply Comments in the above-captioned proceeding, but requests that Channel 222C2 be allocated to Tusayan, AZ, instead of Channel 222A.

Respectfully submitted,

TUSAYAN BROADCASTING CO., INC.

By: 
Denise B. Moline, Esq.
Its Attorney

Denise B. Moline, Esq.
PMB #215
1212 So. Naper Blvd., #119
Naperville, IL 60540

630-753-0112

May 30, 2002

¹Tusayan would not expect Spectrum Scan to reimburse it for the costs associated with upgrade of its facility, other than the frequency shift for which it has already promised reimbursement.

CERTIFICATE OF SERVICE

I, Denise B. Moline, of the law firm of Denise B. Moline, Esq., hereby certify that I have caused to be served, this 30th day of May, 2002, a copy of the foregoing "**Comments in Support of Joint Reply Comments and Counterproposal**" by First Class Mail, postage prepaid, on the following:

*R. Barthen Gorman
Audio Division, Media Bureau
Federal Communications Commission
445 12th St. SW, Room 3-A224
Washington, DC 20554

John J. McVeigh, Esq.
12101 Blue Paper Trail
Columbia, MD 21044-2787
Counsel for NPR Phoenix, LLC

Harry F. Cole, Esq.
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1090 Vermont Ave., N.W., Suite 800
Washington, DC 20005
Counsel for Liberty Ventures III, LLC

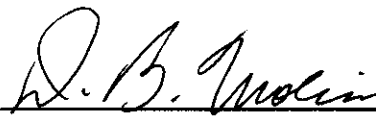
Route 66 Broadcasting, LLC
812 East Beale St.,
Kingman, AZ 86401
Licensee, Station KZKE (FM)

Prescott Radio Partners
9222 Loma Street
Villa Park, CA 92861
Licensee, Station KFPB (FM)

Mr. Charles Crawford
4553 Bordeaux Ave.
Dallas, TX 75205
Petitioner MM Docket No. 01-264
MB Media Group, Inc.
251 Hilton Dr.
St. George, UT 84770
Licensee, Station KXFF

Ms. Deborah Comley
11204 Bowley Dr.
Louisville, KY 40223
Proponent, New FM, Beaver, UT

Lawrence N. Cohn, Esq.
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1920 N Street, NW, Suite 300
Washington, DC 20036-1622
Counsel for Commenter, MM Docket
01-264


Denise B. Moline, Esq.

*Courtesy Copy, via Fed Ex



OWL ENGINEERING & EMC TEST LABS, INC.

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**ENGINEERING STATEMENT ON BEHALF OF
TUSYAN BROADCASTING, CO
IN SUPPORT OF JOINT REPLY COMMENTS AND A
COUNTERPROPOSAL
ASH FORK, ARIZONA
MM DOCKET NO. 02-12
RM-10356**

MAY 28, 2002

**ENGINEERING STATEMENT ON BEHALF OF
TUSAYAN BROADCASTING CO., INC
IN SUPPORT OF REPLY COMMENTS AND A COUNTERPROPOSAL
ASH FORK, ARIZONA
MAY 28, 2002**

ENGINEERING STATEMENT

Owl Engineering, Inc. has been retained by Tusayan Broadcasting Company, Inc. (here after "TBC") to prepare this engineering statement in support of reply comments and a counterproposal in reference to RM-10356, MB Docket No. 02-12 for the creation of a new Class A channel in Ash Fork, Arizona. An alternative option is advanced with these comments.

Below is a summary of the proposed amendments to the FM Table of Allotments, FCC Rule Section 73.202(b) in this proceeding that will be affected by this instant proposal.

Location	Present	Proposed	Counterproposal
Tusayan, AZ	221A	222A	222C2
Chino Valley, AZ	-----	223A	
Dolan Springs, AZ	223C	224C	
Cedar City, UT	223C	221C	

CHANNEL ALLOCATION STUDIES

Channel allocation studies were performed on each of the proposed channels to demonstrate compliance with the proposed counter proposal and for KSGC to be upgraded from a Class A to a Class C2 at the presently licensed transmitter location.

All of the spacing studies were performed utilizing the proposed class and transmitter location coordinates identified in the Joint Reply Comments.

**ENGINEERING STATEMENT ON BEHALF OF
TUSAYAN BROADCASTING CO., INC
IN SUPPORT OF REPLY COMMENTS AND A COUNTERPROPOSAL
ASH FORK, ARIZONA
MAY 28, 2002**

TUSAYAN, ARIZONA

***** FM CHANNEL SPACING STUDY *****

Job title: PROPOSED KSGC SITE
Proposed latitude: N 35 58 14.00
Proposed longitude: W 112 7 53.00
Database file name: C:\FCCnewdata\2002

Proposed channel: 222C2

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
221C1	KZUA	23675	HOLBROOK	AZ	LIC	122.4	215.2	158.0	
225C	KAFF-FM	23934	FLAGSTAFF	AZ	LIC	152.9	124.8	105.0	19.8
275C	KQST	23938	SEDONA	AZ	LIC	153.0	124.8	35.0	
275C	KQST	23963	SEDONA	AZ	LIC	161.2	127.5	35.0	
219C3	KNAQ	23968	FLAGSTAFF	AZ	LIC	149.7	93.5	56.0	37.5
219C2	KNAD	23987	PAGE	AZ	LIC	28.8	92.3	58.0	34.3
222C	KKFR	24378	GLENDALE	AZ	LIC	178.7	292.6	249.0	43.6
223A	FR ADD	24463	CHINO VALLEY	AZ	ADD	194.8	137.8	106.0	31.8
221A	KSGC	24469	TUSAYAN	AZ	LIC	0.0	0.0	106.0	-106.0
220C	970822MA	24820	KINGMAN	AZ	APP	239.3	185.2	105.0	
220C	980611ME	24821	KINGMAN	AZ	APP	239.5	185.2	105.0	
220C	980619MH	24822	KINGMAN	AZ	APP	238.9	188.6	105.0	
220C	980619MK	24823	KINGMAN	AZ	APP	239.4	185.2	105.0	
223C	KSSD	24869	CEDAR CITY	UT	LIC	329.6	216.4	188.0	28.4
224C	KRCY	25124	DOLAN SPRINGS	AZ	LIC	258.3	198.1	105.0	
224C	KRCY	25131	DOLAN SPRINGS	AZ	CP	260.4	200.2	105.0	
222C	KOMP	25439	LAS VEGAS	NV	LIC	270.9	303.9	249.0	
222C	KOMP	25446	LAS VEGAS	NV	LIC	270.2	262.6	249.0	13.6

***** End of channel 222 study *****

This study clearly demonstrates that an upgrade to a Class C2 is allowable and in complete compliance with FCC Section 73.207 using all of the proposed Joint Reply Comments station locations and Classes.

**ENGINEERING STATEMENT ON BEHALF OF
TUSAYAN BROADCASTING CO., INC
IN SUPPORT OF REPLY COMMENTS AND A COUNTERPROPOSAL
ASH FORK, ARIZONA
MAY 28, 2002**

CHINO VALLEY, ARIZONA

***** FM CHANNEL SPACING STUDY *****

Job title: CHINO VALLEY
Proposed latitude: N 34 46 10.00
Proposed longitude: W 112 31 3.00
Database file name: C:\FCCnewdata\2002

Proposed channel: 223A

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
221C2	KSGC	24469	TUSAYAN	AZ	LIC	14.6	137.8	106.0	31.8
223C1	KTHQ	23384	EAGAR	AZ	LIC	101.3	275.4	200.0	75.4
225C	KAFF-FM	23934	FLAGSTAFF	AZ	LIC	76.2	95.0	95.0	0.0
225C		23948	FLAGSTAFF	AZ	LIC	76.2	95.0	95.0	0.0
222C	KKFR	24378	GLENDALE	AZ	LIC	165.2	164.7	165.0	-0.3
223A	FR_ADD	24463	CHINO VALLEY	AZ	ADD	0.0	0.0	115.0	-115.0
277A	KZKE	24466	SELIGMAN	AZ	LIC	340.0	65.5	10.0	55.5
224A	FR_ADD	24798	SALOME	AZ	ADD	219.9	153.5	72.0	81.5
276C3	KBJU	24805	BAGDAD	AZ	CP MOD	249.7	70.2	12.0	58.2
276C3	KBJU	24806	BAGDAD	AZ	APP	247.1	81.6	12.0	69.6
220C	970822MA	24820	KINGMAN	AZ	APP	287.3	130.1	95.0	35.1
220C	980611ME	24821	KINGMAN	AZ	APP	287.5	130.5	95.0	35.5
220C	980619MH	24822	KINGMAN	AZ	APP	285.7	131.3	95.0	36.3
220C	980619MK	24823	KINGMAN	AZ	APP	287.3	130.3	95.0	35.3
224C1	KRCY	25116	KINGMAN	AZ	LIC	280.4	171.4	133.0	38.4
224C	KRCY	25124	DOLAN SPRINGS	AZ	LIC	300.3	184.1	165.0	19.1
224C1	KRCY	25125	KINGMAN	AZ	LIC	280.4	171.4	133.0	38.4
224C	KRCY	25131	DOLAN SPRINGS	AZ	CP	301.6	190.5	165.0	25.5
222C	KOMP	25446	LAS VEGAS	NV	LIC	300.5	264.0	165.0	99.0

***** End of channel 223 study *****

**ENGINEERING STATEMENT ON BEHALF OF
TUSAYAN BROADCASTING CO., INC
IN SUPPORT OF REPLY COMMENTS AND A COUNTERPROPOSAL
ASH FORK, ARIZONA
MAY 28, 2002**

MOPA VALLEY, NEVADA

***** FM CHANNEL SPACING STUDY *****

Job title: KRCY NEW SITE
Proposed latitude: N 36 35 6.00
Proposed longitude: W 114 36 1.00
Database file name: C:\FCCnewdata\2002

Proposed channel: 224C

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
221C2	KSGC	24469	TUSAYAN	AZ	LIC	106.4	232.1	105.0	127.2
225C	KAFF-FM	23934	FLAGSTAFF	AZ	LIC	121.9	332.3	241.0	91.3
223C	KSSD	24869	CEDAR CITY	UT	LIC	42.3	160.3	241.0	-80.7 MX
224C3	KDSS	25175	ELY	NV	LIC	354.6	296.8	237.0	59.8
224C2	KDSS	25176	ELY	NV	CP	354.6	296.8	249.0	47.8
224C2	KDSS	25177	ELY	NV	CP	354.6	296.8	249.0	47.8
226C	KQOL-FM	25434	LAS VEGAS	NV	LIC	229.9	106.1	105.0	1.1
222C	KOMP	25439	LAS VEGAS	NV	LIC	229.8	106.1	105.0	1.1
278C	KISF	25477	LAS VEGAS	NV	LIC	209.6	73.6	48.0	25.6
224B1	KZIQ-FM	26207	RIDGECREST	CA	LIC	247.1	305.2	259.0	46.2
224A	KZIQFM	26229	RIDGECREST	CA	APP	249.8	297.6	226.0	71.6
224A	KZIQ-FM	26237	RIDGECREST	CA	CP	249.4	294.3	226.0	68.3
224A	KHWK	26246	TONOPAH	NV	LIC	306.3	285.0	226.0	59.0

***** End of channel 224 study *****

CEDAR CITY, UTAH

***** FM CHANNEL SPACING STUDY *****

Job title: CEDAR CITY
Proposed latitude: N 37 38 41.00
Proposed longitude: W 113 22 38.00
Database file name: C:\FCCnewdata\2002

Proposed channel: 221C

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
221C3		23716	WELLINGTON	UT	LIC	46.6	312.1	237.0	75.1
219C2	KNAD	23987	PAGE	AZ	LIC	123.7	187.2	105.0	82.2
221C2	KSGC	24469	TUSAYAN	AZ	LIC	148.8	216.5	188.0	28.5
220C	970822MA	24820	KINGMAN	AZ	APP	189.2	284.9	241.0	43.9
220C	980611ME	24821	KINGMAN	AZ	APP	189.3	284.5	241.0	43.5
220C	980619MH	24822	KINGMAN	AZ	APP	189.6	288.3	241.0	47.3
220C	980619MK	24823	KINGMAN	AZ	APP	189.3	284.9	241.0	43.9
219C3	KLNR	25157	PANACA	NV	LIC	285.1	109.3	96.0	13.3
222C	KOMP	25439	LAS VEGAS	NV	LIC	226.0	265.8	241.0	24.8

***** End of channel 221 study *****

**ENGINEERING STATEMENT ON BEHALF OF
TUSAYAN BROADCASTING CO., INC
IN SUPPORT OF REPLY COMMENTS AND A COUNTERPROPOSAL
ASH FORK, ARIZONA
MAY 28, 2002**

DECLARATION

I, Garrett G. Lysiak, P.E., declare and state that I am a graduate electrical engineer with a B.E.E.E. from New York University and my qualifications are a matter of record with the Federal Communications Commission, and that I am a principal engineer in the firm of Owl Engineering and EMC Test Labs, Inc., and that I have provided engineering services since 1973.

Owl Engineering has been requested by Tusayan Broadcasting Company, Inc to prepare this instant engineering statement in support of Joint Reply comments and a Modified Counter proposal concerning a rule making petition to amend the FM Table of Allotments MM Docket 02-12 Ash Fork, Arizona.

All facts contained herein are true of my own knowledge except where it is stated to be on information or belief, and as to those facts, I believe them to be true.

Respectfully Submitted,



Garrett G. Lysiak, P.E.

May 28, 2002